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July 26, 2006

Ms. Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

RECEIVED

JUL 27 2006

PUBLIC SERVICE
COMMISSION

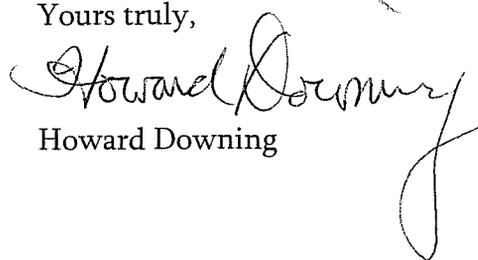
RE: Case No. 2006-00214
Motions of Blue Grass Energy
Cooperative Corporation

Dear Ms. O'Donnell:

Enclosed for filing are Motions of Blue Grass Energy Cooperative Corporation to provide temporary and interim service to the new Wal-Mart Store at Cynthiana.

Please notify if any additional information is required.

Yours truly,


Howard Downing

Enclosure
HD/pb

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

IN THE MATTER OF:)
PETITIONS OF BLUE GRASS ENERGY)
COOPERATIVE CORPORATION AND)
KENTUCKY UTILITIES COMPANY TO)
BE DESIGNATED AS THE RETAIL)
ELECTRIC SERVICE SUPPLIER FOR)
THE NEW WAL-MART STORE)
NUMBER 591 LOCATED IN)
CYNTHIANA, KENTUCKY)

JUL 27 2006

PUBLIC SERVICE
COMMISSION

NO. 2006-00214

MOTIONS BY BLUE GRASS ENERGY FOR
AUTHORIZATION TO PROVIDE
TEMPORARY AND INTERIM SERVICE
TO NEW WAL-MART STORE
(NO. 591) IN CYNTHIANA, KENTUCKY

Petitioner and Movant, Blue Grass Energy Cooperative Corporation (herein "Blue Grass"), moves the Public Service Commission for orders as follows:

1. For an order scheduling an informal conference with the Commission Staff to provide opportunity to discuss possible settlement and resolution of all issues related to temporary and interim electrical service to the site of the new Wal-Mart Store (No. 591) at Cynthiana, Kentucky; and

2. For an order authorizing Blue Grass to provide temporary and interim electrical service to the site of the new Wal-Mart Store (No.591) at Cynthiana, Kentucky during the pendency of this case until a final order is entered by the commission; and

3. For an order scheduling a due process hearing before the commission to determine

which utility should provide temporary and interim electrical service to the new Wal-Mart Store (No. 591) at Cynthiana if no resolution can be made at the informal conference.

SUMMARY OF REASONS SUPPORTING TEMPORARY AND INTERIM ELECTRICAL SERVICE BY BLUE GRASS TO THE NEW WAL-MART STORE (NO. 591) AT CYNTHIANA.

A. BLUE GRASS HAS THE CLOSEST EXISTING DISTRIBUTION LINES TO THE SITE OF THE NEW WAL-MART STORE IN CYNTHIANA.

Blue Grass contends that its existing distribution lines are closest in proximity to the site of the new Wal-Mart Store. Blue Grass has an existing 3-phase double circuit overhead line located within 30 feet of the location of the new Wal-Mart Store in Cynthiana.

Blue Grass has the closest proximity of existing distribution lines to the new Wal-Mart Store. Blue Grass is ready, willing and able to provide all electrical service required by Wal-Mart, including the installation of a pad mounted transformer by the middle of September if approved and authorized by this commission.

B. BLUE GRASS WAS FIRST FURNISHING RETAIL ELECTRICAL SERVICE TO THE SITE OF THE NEW WAL-MART STORE AND HAS A DOUBLE CIRCUIT 3-PHASE LINE EXISTING IN PLACE AT THE SITE OF NEW WAL-MART STORE.

Blue Grass contends retail electrical service was first provided by it in 1938 to the site of the new Wal-Mart Store. Blue Grass has continuously provided electrical service to this site since 1938 with an existing double circuit 3 phase line now in place (and within 30 feet of the

new building site of the new Wal-Mart Store).

C. BLUE GRASS HAS ADEQUATE AND DEPENDABLE EXISTING DISTRIBUTION LINES TO PROVIDE DEPENDABLE, HIGH QUALITY RETAIL ELECTRIC SERVICE AT REASONABLE COSTS.

Blue Grass has adequate and dependable existing distribution lines to provide to the new Wal-Mart Store at Cynthiana with dependable, high quality retail electric service at reasonable costs. Blue Grass has an existing double circuit 3-phase line located on the site property within 30 feet of the building site of new Wal-Mart Store in Cynthiana. Blue Grass has a substation on New Lair Road within approximately .75 miles of the site of the new Wal-Mart Store.

Blue Grass can provide dependable, high quality retail electric service at reasonable costs because of the close proximity to the site. The electrical rates of Blue Grass have been approved as reasonable by this Kentucky Public Service Commission.

D. BLUE GRASS IS IN THE BEST AND SUPERIOR POSITION TO PROVIDE RETAIL ELECTRICAL SERVICE TO THE NEW WAL-MART STORE WHICH WILL BEST ELIMINATE AND PREVENT DUPLICATION OF ELECTRICAL LINES AND FACILITIES SUPPLYING SAID NEW STORE.

Blue Grass contends that the close proximity of its electric lines and facilities will most economically and best eliminate and prevent duplication of electrical lines and facilities serving the new Wal-Mart Store.

Blue Grass has the capacity, ability and readiness to provide electrical service to the new

Wal-Mart Store.

Blue Grass has a superior ability to provide dependable, high quality electric service to the new Wal-Mart Store with a full service and fully staffed and equipped district office located in Cynthiana (within 2 ½ miles of the new Wal-Mart Store). Blue Grass will be able to provide full service to the new Wal-Mart Store within a short time from the facilities at the Cynthiana District office.

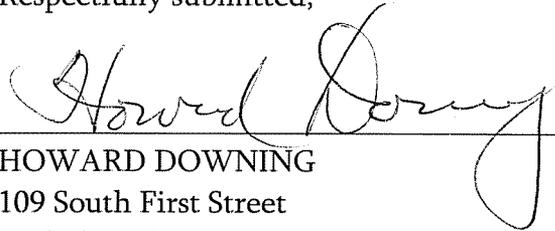
CONCLUSION

Blue Grass respectfully requests all reasonably convenient consideration of the above Motions to allow the best electrical service to the new Wal-Mart Store.

The determination of temporary and interim service will require a full and complete examination of all the facts related to the issues set forth above.

Blue Grass requests the Public Service Commission to consider all of the above Motions and to authorize and approve Blue Grass to provide temporary and interim electrical service to the new Wal-Mart Store at Cynthiana in accordance with the above Motions.

Respectfully submitted,



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ATTORNEY FOR BLUE GRASS ENERGY
COOPERATIVE CORPORATION

I certify that a true copy of the above petition was mailed this 26th day of July, 2006 to the following:

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